

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

| | | |
|--|---|---------------------------------|
| FlavaWorks Entertainment, Inc., |) | |
| Blatino Media, Inc., |) | |
| Plaintiff, |) | Case No. : 1:24-cv-09725 |
| |) | |
| v. |) | |
| |) | JURY TRIAL DEMANDED |
| Joel Lewitzky, |) | |
| John Doe 1 (username augire2) |) | |
| John Doe 2 (username batsu454) |) | |
| John Doe 3 (username blackbike20) |) | |
| John Doe 4 (username Cards1uk) |) | |
| John Doe 5 (username Chaman) |) | |
| John Doe 6 (username Clorino404) |) | |
| John Doe 7 (username Daledale) |) | |
| John Doe 8 (username Daleorama) |) | |
| John Doe 9 (username Dave858) |) | |
| John Doe 10 (username ekospirit) |) | |
| John Doe 11 (username gzh004) |) | |
| John Doe 12 (username Hubrys) |) | |
| John Doe 13 (username Joewija) |) | |
| John Doe 14 (username Lilraverprep) |) | |
| John Doe 15 (username Luvpecs) |) | |
| John Doe 17 (username Paulrc) |) | |
| John Doe 18 (username Slchung) |) | |
| John Doe 19 (username Thomblack) |) | |
| John Doe 20 (username Trashcat) |) | |
| John Doe 21 (username Yatjug) |) | |
| John Doe 22 (username Zanafan) |) | |
| John Doe 23 (username xaoslao) |) | |
| Defendants. |) | |

**PLAINTIFFS' MOTION TO AMEND THE COMPLAINT AND CONVERT JOHN DOES
TO NAMED DEFENDANTS**

Plaintiffs, FlavaWorks Entertainment, Inc. and Blatino Media, Inc., by and through their undersigned counsel, respectfully move this Honorable Court for leave to amend the Complaint to convert certain John Doe Defendants into named Defendants. In support of this Motion, Plaintiffs state as follows:

1. Plaintiffs filed the Complaint in this **matter**, identifying certain defendants as "John Does" because their identities were unknown at the time of filing.

2. The Court Clerk is unable to issue summons for "John Doe" defendants without specific identifying information.
3. Through further investigation of Plaintiffs' databanks, which were not previously available at the time of filing, Plaintiffs have identified the following individuals as corresponding to certain "John Doe" Defendants:
 - a. John Doe 3 (username blackbike20) has been identified as John E. Perkins;
 - b. John Doe 6 (username Clorino404) has been identified as Christopher Lorino;
 - c. John Doe 13 (username Joewija) has been identified as Joe Wija;
 - d. John Doe 14 (username Lilraverprep) has been identified as Gregory Ghazal; and
 - e. John Doe 21 (username Yatjug) has been identified as Peter Sacco.
4. Plaintiffs obtained this information through diligent examination and cross-referencing of records within their proprietary databanks.
5. Federal Rule of Civil Procedure 15(a)(2) provides that leave to amend a pleading should be freely granted when justice so requires.
6. Conversion of the John Doe Defendants to named individuals is necessary for proper service of process and for this matter to proceed efficiently and fairly.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court grant leave to amend the Complaint to convert John Doe Defendants 3, 6, 13, 14, and 21 to named Defendants John E. Perkins, Christopher Lorino, Joe Wija, Gregory Ghazal, and Peter Sacco, respectively, and to issue summons for these named Defendants. Plaintiffs further request any other relief this Court deems just and appropriate.

Respectfully submitted,

/s/ Hameed Odunew
Attorney for Plaintiffs

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